

Comments from the South Carolina Chamber of Commerce Environmental Technical Committee

- 1. The ETC very much appreciates the significant number of improvements made to the ambient air monitoring network in the past two (2) years since the stakeholder group audited many of the sites and recommended improvements (June 2007).** Many of the changes were captured in the 2008 and 2009 PLANs. The ETC feels that the network is much more robust today because of the successes that DHEC has had meeting commitments such as replacing the Greenville CMS monitor and establishing new sites in Spartanburg (T.K. Gregg site) and Georgetown (Beck Administration Site). Also, many sites no longer providing useful data have been discontinued as planned.

The Department acknowledges this comment.

- 2. The ETC requests that SCDHEC provide interpretation and explanation as to why every PM_{2.5} site in the state experienced a significant decrease in design values 2006-2008 (compared to 2005-2007).**

The Department acknowledges this comment and is currently analyzing the data from last year. Please note that the decreases in PM_{2.5} concentrations were observed across the region and were not restricted to South Carolina.

- 3. The ETC requests that SCDHEC provide the “implementation plan and schedule” for the 2009 plan and the 2010 plan.** In the ETC’s comments dated July 2, 2008, the ETC requested that SCDHEC provide an “implementation plan and schedule”. The SCDHEC Bureau of Air Quality (BAQ) agreed to this request but has not yet provided one. Transparency between SCDHEC and the stakeholders is not only important, but a very valuable tool for the continual improvement of South Carolina’s ambient air network. The ETC’s request is repeated in this set of comments because all stakeholders need to clearly understand DHEC’s priorities and schedules for implementing the agreed upon changes and not be surprised when some changes are implemented and some are not.

In its response to comments for the 2009 Monitoring Plan, the Department committed to completing the implementation of all outstanding items as expeditiously as possible. When the monitoring network was realigned in 2008, there was a list of over thirty items to be implemented. This included the establishment of new sites, termination of monitoring at other sites and moving samplers and monitors around the state. This large undertaking is near completion with only three items remaining. The Department provided an update to stakeholders concerning progress made on implementing the monitoring plan in January, 2009.

The Department would like to restate that selecting, securing and establishing new monitoring sites is not a quick process and the Department will continue implementation of the Monitoring Plan as resources allow.

- 4. The ETC recommends that progress be made on implementing agreed-upon changes for ALL monitoring sites with serious quality issues, as determined during the joint stakeholder and SCDHEC staff teams during the 2007 field audit.** The ETC recognizes that SCDHEC committed to improvements for several monitoring sites in the 2008 and 2009 PLANs. ETC sees where some of the agreed-upon improvements have been made and others have not. The ETC feels that progress must be made in implementing the previously agreed-upon improvements for the remaining monitor sites. The remaining monitor sites include Taylors, which is the second highest PM_{2.5} site, and Georgetown CMS for which an alternate monitoring method has yet to be identified and implemented.

The Department disagrees that the monitoring sites mentioned have “serious quality issues.” In previous responses to comments, the Department has stated it “...intends to assure that the samplers and monitors comply with as many of the recommendations contained within the regulations and applicable guidance documents as is possible.” Furthermore, quality assurance results are completely documented and submitted to the national database with the data from the monitoring site. The monitoring data for criteria pollutants is certified to be accurate taking into consideration the quality assurance findings.

With emerging air quality issues across the state, the Department has had to focus on projects not traditionally covered by the annual monitoring plan. The Department continues to evaluate alternative sites across the state where appropriate. We would like to note that monitoring values at most sites across the state are trending downwards showing real improvements in air quality.

A potential alternative method for Georgetown is currently being evaluated. The Department will judge if that method is appropriate for Georgetown at the conclusion of the evaluation.

The Department would like to restate that selecting, securing and establishing new monitoring sites is not a quick process and the Department will continue implementation of the Monitoring Plan as resources allow.

- 5. The ETC requests that future EPA system audits include a detailed review of siting requirements.** The “2007 Systems Audit” conducted by EPA appears to fall short of including a strong assessment of monitor siting.

The Department acknowledges this comment and will pass this along to the EPA for their consideration.

- 6. The ETC recommends that sites with known siting issues NOT be certified by SCDHEC management as suitable for comparison with the NAAQS (page**

8 of the plan). The ETC recommends that sites with such issues not be certified as “suitable” until the agreed-upon measures are taken to either correct the identified deficiencies or replacement sites are established. Sites with known siting issues that have been certified as suitable for comparison with the NAAQS include, but are not limited to, Taylors, Westview, Sneed, Bates House and Irmo.

There are a number of things that support certification of the data – most important is that quality assurance results are completely documented and submitted to the national database with the data. The monitoring data for criteria pollutants is certified to be accurate taking into consideration the quality assurance findings.

All sites are reviewed periodically to assure the monitoring meets the Part 58 Appendix E requirements for the location of the probe, helping ensure the monitoring data is representative of the intended area. The ambient monitor network sites for which data is certified meet 40 CFR, Part 58 siting requirements.

- 7. The ETC recommends that SCDHEC evaluate the potential impact that the high voltage power line may have on the Due West ozone monitoring site.**
The power line, located approximately 0.5 miles from the Due West monitor site, may be a source of ozone generation.

The Department acknowledges this comment and encourages the ETC to provide any information they may have concerning the issue of potential impact of high voltage power lines on ozone measurements at ambient monitoring sites.

- 8. The ETC recommends that the Cape Romain monitoring site be relocated from Moores Landing to a pristine area within the National Wildlife Refuge (NWR) so visibility and air quality improvements can be accurately determined and data bias from nearby local sources can be eliminated.** The current monitoring site is located on a dirt road leading to the maintenance complex for the NWR. Particulate matter, volatile organic compounds (VOC) and combustion emissions including nitrogen oxides (NO_x) and sulfur dioxide (SO₂) (fine particulate precursors) are present from truck traffic, heavy machinery and fuel dispensing and burning. Furthermore, Cape Romain is the site where IMPROVE/VISTAS operates their visibility and ambient air monitoring. ETC proposes for SCDHEC to proactively seek a more representative location for the monitor site in advance of the deadlines for the glide path assessments.

The instruments used to assess the visibility impacts of particulate on regional haze are operated by an outside entity and are not in the control of the Department. The current location of the monitoring site with the remaining equipment that is owned by the Department is the most suitable location based on infrastructure needs and staff safety. The large majority of the Cape Romain National Wildlife Refuge is made up of areas that are inaccessible or impracticable for ambient air monitoring. While possibly more ‘pristine’, other areas within the Refuge have neither adequate access to power nor are accessible

to staff for the performance of Quality Assurance activity or equipment maintenance. The Department believes the present monitoring location is reasonably representative of the Cape Romain NWR Class 1 area.

- 9. The ETC recommends that SCDHEC create an ambient air monitoring network Website for purposes of explaining the status of each monitoring site, including the site's data summary, changes made at each site and the rationale for each change.** It was noted that many sites listed in the Network Plan had many changes from 2009 to 2010 with respect to monitor details such as scale, objective or designation (e.g., SLAMS versus SPM). Presently, the stakeholders can only compare details of the network plans from year to year. This proves to be an ineffective, non-transparent approach to communicating the details of the ambient air monitoring network to stakeholders.

The Department acknowledges this comment.